

**COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN II)**  
**Northern and Central California, Nevada, and Utah**  
**Contract Number N62474-94-D-7609**  
**Contract Task Order No. 0126**

**Prepared For**

**DEPARTMENT OF THE NAVY**  
**Amelia Duque, Engineer-in-Charge**  
**Engineering Field Activity West**  
**Naval Facilities Engineering Command**  
**San Bruno, California**

**FINAL**  
**FINDING OF SUITABILITY TO LEASE REUSE ZONE 3B**  
**PARCEL T093, A PORTION OF PARCEL T096, A PORTION OF PARCEL T097,**  
**A PORTION OF PARCEL T103, PARCEL T104,**  
**A PORTION OF PARCEL T105, AND PARCEL T106**  
**NAVAL STATION TREASURE ISLAND,**  
**CALIFORNIA**

**September 1997**

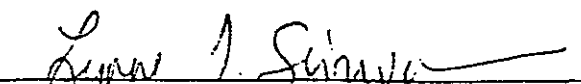
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## 1.0 PURPOSE

a. The purpose of this finding of suitability to lease (FOSL) is to document environmental findings that may impact the proposed lease of Reuse Zone 3B at Naval Station Treasure Island (NAVSTA TI) in San Francisco, California. Reuse Zone 3B consists of Parcel T093, a portion of Parcels T096, T097, and T103, Parcel T104, a portion of Parcel T105, and Parcel T106. The subject property is described in Section 2.0 and is shown on Figure 1. The subject property will be leased to the City of San Francisco for residential and commercial or industrial use. The U.S. Department of the Navy (Navy) owns the land and the buildings at the subject property.

b. This FOSL is a result of a thorough analysis of the information contained in the following documents:

- "Base Realignment and Closure Cleanup Plan Naval Station Treasure Island," PRC Environmental Management, Inc. (PRC), March, 1997 (BCP update)
- "Draft Remedial Investigation Report Naval Station Treasure Island," PRC, October, 1996
- "Final Site-Specific Environmental Baseline Survey for Reuse Zone 3 at Naval Station Treasure Island," PRC and Uribe & Associates (U&A), September, 1997 (SSEBS)
- "Environmental Baseline Survey Screening Level Data Report, Naval Station Treasure Island, California," PRC and U&A, July, 1997
- "Final Asbestos Survey Report, Naval Station Treasure Island," Mare Island Naval Shipyard, December, 1995
- "Final Basewide Environmental Baseline Survey Report for Naval Station Treasure Island," ERM-West, Inc., May, 1995 (basewide EBS)
- "Final Environmental Baseline Survey Sampling Workplan for Naval Station Treasure Island," ERM-West, Inc., April, 1996
- "Lead Management Plan, Naval Support Activity Treasure Island, San Francisco, California," Navy Public Works Center (PWC) Norfolk, May, 1996
- "Phase IIB Remedial Investigation Summary of Validated Data, Naval Station Treasure Island," PRC, May, 1996
- "Workplan Abandonment and Removal of Inactive Fuel Pipelines Naval Station Treasure Island, California," Subsurface Consultants, Inc., June, 1995

## 2.0 PROPERTY DESCRIPTION

Reuse Zone 3B, which is located in the north and west portion of NAVSTA TI, encompasses approximately 23 acres and consists of Parcel T093, a portion of Parcels T096, T097, and T103, Parcel T104, a portion of Parcel T105, and Parcel T106. There are 36 buildings or structures at Reuse Zone 3B. Open space in the reuse zone includes asphalt roadways and parking areas, concrete walkways, landscaping, unmanaged vegetation, and bare soil. The building information for each parcel in Reuse Zone 3B is summarized in Table 1 at the end of this FOSL. Historical information regarding Reuse Zone 3B can be found in the SSEBS for Reuse Zone 3.

Reuse Zone 3B is bounded by Parcels T079, T086, T087, T098, T040, and a portion of Parcel T097 to the south, Parcels T113, T092, T095, and a portion of Parcel T105 to the east, Parcels T108 and T107, a portion of Parcel T103, and Parcel T094 to the north, and Parcels T102 and T099 to the west. Installation Restoration (IR) Sites 01, 06, 07, 12, and 20 are located adjacent to the subzone.

**Parcel T093.** Parcel T093 comprises 2.55 acres (see Table 1). The parcel consists entirely of open space used as a parking lot.

**Parcel T096.** Parcel T096 comprises 7.85 acres, approximately 7 acres of which are included in Reuse Zone 3B. Sixteen residential buildings and housing units (Buildings 1101, 1103, 1105, 1111, 1113, 1400, 1401, 1402, 1403, 1404, 1406, 1409, 1411, 1412, 1413, and 1418) occupy approximately 20 percent of the parcel area (see Table 1). The remaining 80 percent of the parcel is open space covered by asphalt roadways, concrete walkways, and landscaping.

**Parcel T097.** Parcel T097 comprises 5.82 acres, approximately 2.5 acres of which are included in Reuse Zone 3B. Five residential buildings (Buildings 1405, 1408, 1410, 1419, and 1420) occupy approximately 20 percent of the portion of parcel within Reuse Zone 3B (see Table 1). The remaining 80 percent of the portion of the parcel within Reuse Zone 3B is open space covered by asphalt roadways, concrete walkways, and landscaping. IR Site 20 borders this portion of Parcel T097 to the south.

**Parcel T103.** Parcel T103 comprises 51.64 acres, approximately 1.2 acres of which are included in Reuse Zone 3B. Two residential buildings (Buildings 1247 and 1249) occupy approximately 30 percent

of the parcel area (see Table 1). The remaining 70 percent of the parcel is open space covered by asphalt roadways, concrete walkways, and landscaping.

**Parcel T104.** Parcel T104 comprises 1.38 acres. Three residential buildings (Buildings 1100, 1102, and 1107) occupy 20 percent of the parcel (see Table 1). The remaining 80 percent of the parcel is open space consisting of asphalt roadways, concrete walkways, and vegetated and landscaped areas.

**Parcel T105.** Parcel T105 comprises 9.42 acres, approximately 6 acres of which are included in Reuse Zone 3B. Nine residential buildings (Buildings 1212, 1214, 1216, 1218, 1250, 1251, 1252, 1253, and 1254) occupy approximately 30 percent of the portion of parcel within Reuse Zone 3B (see Table 1). The remaining 70 percent of the portion of the parcel within Reuse Zone 3B is open space consisting of asphalt roadways, concrete walkways, and vegetated and landscaped areas.

**Parcel T106.** Parcel T106 comprises 3.00 acres. Building 264 occupies approximately 35 percent of the parcel area and contains offices, PWC shops, and miscellaneous storage (see Table 1). Building 264 has been used as a refrigerated storehouse and morgue. The remaining 65 percent of the parcel is open space and is used for vehicle parking and equipment storage.

### 3.0 REGULATORY COORDINATION

The California Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board for the San Francisco Bay Region, and the U.S. Environmental Protection Agency (EPA) were notified at the initiation of the SSEBS and the FOSL and were provided with draft versions of the documents to facilitate their consultative role in developing the documents. Regulatory comments received during SSEBS and FOSL development have been reviewed, addressed, or incorporated into the document as appropriate. A scoping meeting was conducted between the Navy and the regulatory agencies on March 19, 1997, before the SSEBS was conducted and before the FOSL was prepared.

EPA and DTSC disagree with the DoD guidelines on lead-based paint. EPA and DTSC contend that contamination of soil resulting from lead-based paint constitutes a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) release.

#### **4.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE**

In accordance with the requirements of the National Environmental Policy Act (NEPA) and the Navy's Environmental and Natural Resources Program Manual (OPNAVINST 5090.1B), a NEPA document shall accompany this FOSL.

#### **5.0 ENVIRONMENTAL CONDITION OF THE PROPERTY**

As outlined in the SSEBS for NAVSTA TI, Parcel T093 is classified as environmental condition of property (ECP) area type 1. Parcels T096, T103, and T104 are classified as ECP area type 6. Parcels T097, T105, and T106 are classified as ECP area type 7.

ECP area type 1 identifies areas that are suitable for transfer without restrictions. ECP area type 6 identifies areas where contamination has been identified, but a response action has not been implemented. The ECP area type 7 classification identifies areas that are unevaluated or that require further evaluation. Based on the current classification status, parcels in ECP area types 1 through 6 are eligible for transfer. Therefore, the three parcels in Reuse Zone 3B which remain ECP area type 7 (Parcels T097, T105, and T106) are the only parcels not eligible for transfer at this time. All parcels in Reuse Zone 3B are eligible for lease.

#### **6.0 LEASE NOTIFICATIONS AND RESTRICTIONS**

The environmental documents listed in Section 1.b of this FOSL were evaluated to identify environmental factors that require specific restrictions under the lease to preclude threats to human health or the environment, or that require notification to the lessee. The factors that were considered are listed in Table 2 at the end of this FOSL. The factors that require either restrictions or notification are also identified in Table 2 and are discussed in Sections 6.1 through 6.4. The Navy has determined that the remaining factors listed in Table 2 pose no significant threat to human health or the environment and, therefore, require neither restrictions in the lease nor notifications to the lessee. All required lease restrictions must also be made part of all subleases within Reuse Zone 3B, and all references to lessees and leases in this document also include all authorized sublessees and subleases.

IR Site 20, the Auto Hobby Shop and Transportation Center, is located on a portion of Parcel T097 adjacent to and upgradient of Reuse Zone 3B. The samples collected from IR Site 20 indicated that total petroleum hydrocarbons as diesel (TPH-d) and total petroleum hydrocarbons as motor oil (TPH-mo) were present in soil and groundwater samples collected at the site. Total petroleum hydrocarbons as gasoline (TPH-g) and volatile organic compounds were also detected in groundwater samples. The detected constituents were evaluated in the risk evaluation in the SSEBS for Reuse Zone 3B and are not expected to be of concern for the proposed reuse of Reuse Zone 3B. Remedial activities at IR Site 20 are scheduled to begin in approximately 18 months and may impact reuse activities at Reuse Zone 3B. IR Site 01, the Medical Clinic, IR Site 06, the Fire Training Area, IR Site 07, the Pesticide Storage Area, and IR Site 12, the Old Bunker Area are also located adjacent to Reuse Zone 3B; contamination from these IR sites is not expected to impact the reuse zone. Remedial activities at IR Site 06 are scheduled to begin in approximately 18 months and may impact reuse activities at Reuse Zone 3B.

**Notification.** The Navy and recognized regulatory agencies will be allowed unrestricted access to enter the leased property to conduct investigations and surveys, collect samples, perform remediation, access monitoring wells, or engage in other activities associated with the IR and other environmental programs.

It is possible that the lease area may remain accessible to and be occupied by the lessee during any remedial activities; access restrictions may include requiring the lessee to enter the leased premises via a specific route. Noise, traffic, and other nuisances associated with construction may be expected.

**Restrictions.** The lessee will be restricted from conducting excavation, drilling, or other ground-disturbing activities other than minor repairs of the pavement at Reuse Zone 3B without prior written Navy approval and Navy coordination with applicable federal and state regulatory agencies, as necessary. This lease restriction will not apply to routine landscaping activities. In addition, use of groundwater at NAVSTA TI is prohibited. The lessee will be prohibited from installing any groundwater wells or otherwise using groundwater at the subject property. The lessee shall not damage existing or future groundwater monitoring wells and the lessee will be responsible for any damage it causes to the wells. The lessee shall not interfere with the ongoing IR and other environmental program activities.

## 6.2

### ASBESTOS-CONTAINING MATERIALS

Because of the age of the buildings in Reuse Zone 3B, asbestos-containing material (ACM) may be present within some of the buildings. An asbestos inspection was conducted in Reuse Zone 3B by Mare Island Naval Shipyard in the winter of 1995. ACM was identified in Building 264. Building 264 on Parcel T106 contained some damaged ACM with low friability. In addition, suspect ACM was also identified in Building 264. All of the suspect ACM was non-friable, whether damaged or undamaged. The damaged, friable, and accessible ACM identified at Building 264 will be remediated by the Navy prior to leasing. ACM may also be present in insulation around the steam pipes at some of the parcels. Pipes are likely to be located in the walls and crawl spaces within the buildings, as well as in the ground leading to the buildings. Because of access difficulties, however, it is unlikely that any asbestos-wrapped steam lines would pose a threat to human health.

**Notification.** For the purposes of this lease, no notifications are required with respect to ACM.

**Restrictions.** The lease will require the lessee to conduct routine evaluations of the condition of existing ACM and comply with all applicable federal, state, and local laws relating to asbestos. Before reconstruction or remodeling, the lessee must submit plans to the Navy to prevent an inadvertent disturbance of potential ACM. For the purpose of this lease, the lessee will agree that during its use and occupancy of the property, it will bear all costs for managing the ACM properly. The Navy will require the lessee to (1) obtain written Navy approval before any construction or modification to any building structure and (2) submit an ACM management plan within 30 days of leasing the property.

## 6.3

### LEAD-BASED PAINT (HIGH-PRIORITY FACILITIES)

Residential property to be leased must comply with certain provisions of the federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of Public Law 102-550), as codified in 42 United States Code Section 4822.

Housing constructed between 1960 and 1978 must be inspected for lead-based paint and lead-based hazards. The results of the lead-based paint inspection will be provided to the lessee to identify the presence of lead-based paint and lead-based paint hazards on a surface-by-surface basis. There is no federal lead-based paint hazard abatement requirement for such property. However, prospective lessees

must be provided with a lead hazard information pamphlet, and the contract for transfer must include a lead warning statement. This inspection will not be required when the building is scheduled for non-residential use or if the building is scheduled for residential use and the lessee conducts renovation consistent with all local, state, and federal regulations pertaining to lead-based paint.

All buildings at Reuse Zone 3B were constructed between 1960 and 1978. Lead-based paint surveys have been conducted for 12 residential buildings in the FY-1966 and FY-1969 Housing Areas in Reuse Zone 3B. Lead-based paint was identified on some of the surfaces including the interior and exterior of housing units. Lead was also found in soil samples collected near these housing units at concentrations exceeding the EPA Region IX residential soil preliminary remediation goal of 400 milligrams per kilogram. U.S. Department of Defense policy does not require lead-based paint surveys for industrial or commercial buildings unless the buildings will be reused as family housing. As a result, a lead-based paint survey was not conducted for Building 264 (constructed in 1944) on Parcel T106 which may contain lead-based paint. The soil surrounding Building 264 may also contain lead-based paint.

EPA and DTSC disagree with the DoD guidelines on lead-based paint. EPA and DTSC contend that contamination of soil resulting from lead-based paint constitutes a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) release.

**Notification.** Buildings built before 1978 may contain lead-based paint. Lead from paint, paint chips, and paint dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. The lessee is hereby informed and does acknowledge that the buildings located in Reuse Zone 3B contain lead-based paint and that result in lead-based paint hazards. Soil adjacent to the buildings may contain lead concentrations resulting from previous use of lead-based paint.

**Restrictions.** The lessee shall not permit the use of these premises for residential habitation unless the lessee, at its own expense, has eliminated any hazards of lead-based paint in accordance with all applicable laws, rules, and regulations, and in accordance with the "Guidelines for Evaluation and Control of Lead Based Paint Hazards in Housing," promulgated by the Department of Housing and Urban Development pursuant to Title X of U.S. Public Law 102-550, and the lessee, at its own expense, has received certification from a state-certified lead-based paint assessor or inspector that no lead-based paint hazards are identified at the premises. The lessee shall provide DTSC and EPA the opportunity to



review and comment on any lead-based paint investigation and remediation workplans that result from sampling, testing, and assessment performed by the lessee. Throughout the term of the lease the lessee shall be responsible for monitoring the condition of the lead-based paint and eliminating any hazard that may develop during the term of the lease. Residential structures are defined as any house, apartment, or structure intended for human habitation, including but not limited to a nondwelling facility commonly used by children under 7 years of age, such as a child care center, elementary school, or playground. The lead-based paint assessment certification and, if applicable, any comments from DTSC and EPA shall be submitted to the Navy for information prior to residential occupancy. The lessee shall immediately notify the Navy of any change in occupancy in the affected quarters.

#### **6.4 HAZARDOUS WASTE MANAGEMENT (BY LESSEE)**

The lessee is not anticipated to use any regulated quantities of hazardous materials on the property.

**Notification.** For the purposes of this lease, no notifications are required with respect to hazardous waste management.

**Restriction.** The lessee will be required through the lease to comply with all applicable laws and regulations pertaining to the use, treatment, storage, disposal, and transportation of hazardous materials.

### **7.0 SUMMARY OF LEASE RESTRICTIONS**

Parcel T093, a portion of Parcels T096, T097, and T103, Parcel T104, a portion of Parcel T105, and Parcel T106 may be used by the lessee pursuant to the proposed lease, with the following specified use restrictions in the lease:

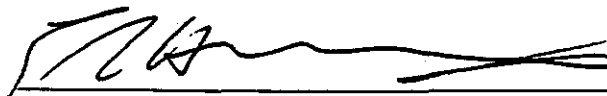
- a) The lessee will be required through the lease to comply with all applicable laws and regulations pertaining to the use, treatment, storage, disposal, and transportation of hazardous materials.
- b) The lessee shall not interfere with the ongoing Installation Restoration and other environmental program activities. The lessee will be prohibited from damaging any existing or future groundwater monitoring wells and will be financially responsible for repairing any damage done to the wells.
- c) The lessee will be restricted from conducting excavation, drilling, or other ground-disturbing activities other than minor repairs of the pavement at Reuse Zone 3B without prior written

Navy approval and Navy coordination with applicable federal and state regulatory agencies, as necessary. This lease restriction will not apply to routine landscaping activities.

- d) Use of groundwater at NAVSTA TI is prohibited. The lessee will be prohibited from installing any groundwater wells or otherwise using groundwater at the subject property.
- e) The lease will require the lessee to conduct routine evaluations of the condition of existing ACM and comply with all applicable federal, state, and local laws relating to asbestos. Before reconstruction or remodeling, the lessee must submit plans to the Navy to prevent an inadvertent disturbance of potential ACM. For the purposes of this lease, the lessee will agree that during its use and occupancy of the property, it will bear all costs for managing the ACM properly. The Navy will also require the lessee to (1) obtain written Navy approval before any construction or modification to any building structure and (2) submit an ACM management plan within 30 days of leasing the property.
- f) The lessee shall not permit the use of these premises for residential habitation unless the lessee, at its own expense, has eliminated any hazards of lead-based paint in accordance with all applicable laws, rules, and regulations, and the lessee, at its own expense, has received certification from a state certified lead-based paint assessor or inspector that no lead-based paint hazards are identified at the premises. Throughout the term of the lease the lessee shall be responsible for monitoring the condition of the lead-based paint and eliminating any hazard that may develop during the term of the lease. The lessee shall immediately notify the Navy of any change in occupancy in the affected quarters.
- g) The lessee will be responsible for obtaining all necessary permits and licenses for their own operation. Any violation of permit conditions will be grounds to require the lessee to cease operations or to terminate the lease.
- h) Uses by the lessee are limited to a type and nature described in the lease document.

## 8.0 FINDING OF SUITABILITY TO LEASE

Based on the foregoing information and analysis, I find that the subject property (as identified in Section 2.0) is suitable to lease and may be used pursuant to the proposed lease, with the specified use restrictions in the lease, with acceptable risk to human health or the environment, and without interference with the environment restoration process.

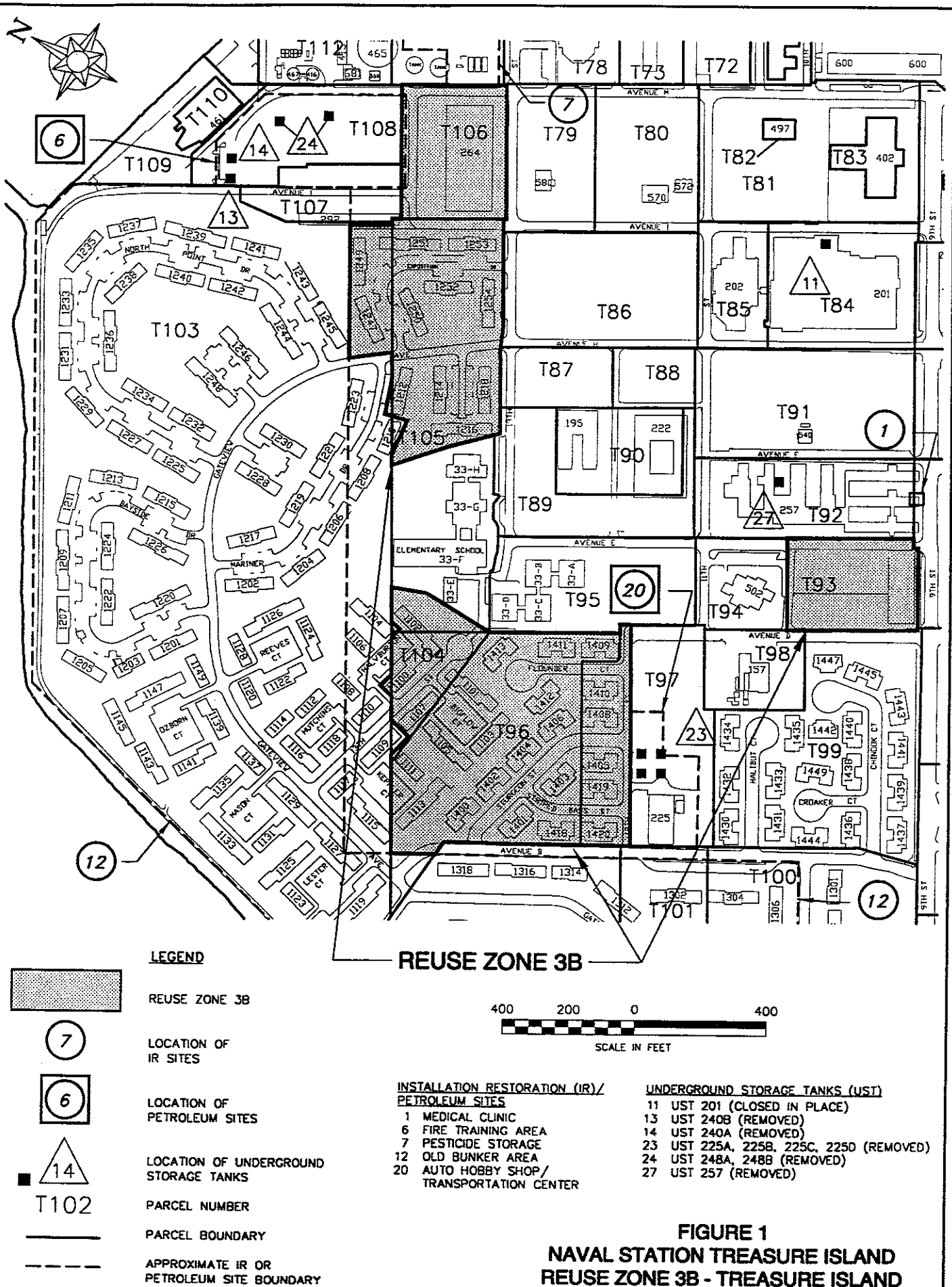


10/13/97

Date

ERNEST R. HUNTER  
CAPTAIN, CEC, USN  
Commanding Officer  
Engineering Field Activity, West  
Naval Facilities Engineering Command

**FIGURE**



## TABLES

TABLE 1

**PROPERTY DESCRIPTION**  
**NAVAL STATION TREASURE ISLAND, REUSE ZONE 3B**

Parcel	Acres	Building Number	Year Built	Building or Parcel Description
T093	2.55	N/A	N/A	Open space
Portion of T096	Approx. 7	1101, 1103, 1105, 1111, 1113 1400, 1401, 1402, 1403, 1404, 1406, 1409, 1411, 1412, 1413, and 1418	1966  1989	Family housing units  Family housing units
Portion of T097	Approx. 2.5	1405, 1408, 1410, 1419, and 1420	1989	Family housing units
Portion of T103	Approx. 1.2	1247 and 1249	1969	Family housing units
T104	1.38	1100, 1102, and 1107	1966	Family housing units
Portion of T105	Approx. 6	1212, 1214, 1216, 1218, 1250, 1251, 1252, 1253, and 1254	1969	Family housing units
T106	3.00	264	1944	Offices, PWC shops, and miscellaneous storage

Note:

N/A Not applicable

PWC Navy Public Works Center

TABLE 2

**ENVIRONMENTAL FACTORS AND RESOURCES CONSIDERED  
FOR REUSE ZONE 3B**

<b>Environmental Factors Considered</b>	<b>Lease Restriction or Notification Required?</b>
Hazardous Substances (Notification)	No
Installation Restoration (IR) Program and Areas of Concern	Yes
Medical/Biohazardous Wastes	No
Oil/Water Separators	No
Unexploded Ordnance	No
Petroleum Products and Derivatives	No
Radioactive and Mixed Wastes	No
Storage Tanks	No
Other Environmental Factors	No
Asbestos	Yes
Drinking Water Quality	No
Indoor Air Quality	No
Lead-Based Paint (High-Priority Facilities)	Yes
Lead-Based Paint (Low-Priority Facilities)	No
Polychlorinated Biphenyls	No
Radon	No
Air Conformity/Air Permits	No
Energy (Utilities such as Natural Gas, Electric, and Coal)	No
Flood Plains	No
Hazardous Waste Management (lessee)	Yes
Historic Property (Archeological/Native American, Paleontological)	No
Occupational Safety and Health Administration	No
Outdoor Air Quality	No
Prime/Unique Farmlands	No
Sanitary Sewer Systems (Wastewater)	No
Sensitive Habitat	No
Septic Tanks (Wastewater)	No
Solid Wastes	No
Threatened/Endangered Species	No
Transportation	No
Wetlands	No